

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

The United States of America

vs.

Oswaldo Trejo-Casas,
a/k/a Abraham Trejo-Martinez

Case No.: 14-4437

*APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE BRIEF AND JOINT APPENDIX*

The Appellant, Oswaldo Trejo-Casas, by and through the undersigned court-appointed counsel, Hannah Rogers Metcalfe, of Metcalfe & Atkinson, LLC, hereby respectfully moves this Court for a fifteen (15) day extension of time to file his brief and joint appendix, from August 18, 2014 to September 2, 2014.

In support of the Motion, the Appellant shows the Court as follows:

1. Appellant does not speak or read the English language.
2. All communications with Appellant must be conducted through an interpreter and written communications must be translated.
3. Due to the distance of the facility in which Appellant is incarcerated from counsel's office, all communication with Appellant must occur over the telephone with an interpreter present in Appellant's office.

4. The undersigned counsel has received the transcripts and begun the production of the final brief to be filed in this case, including an initial telephone conference with Appellant.
5. Prior to the filing of Appellant's brief, counsel wishes to: (1) have the brief read to Appellant by an interpreter; (2) discuss the brief with Appellant by means of an interpreter.
6. In order to adequately represent the Appellant, counsel is in need of additional time to schedule a lengthy telephone call with Appellant with an appropriate interpreter present.
7. Counsel for the Appellant has contacted the Government and been informed by its representative that it does not have any objection to the extension of time to file the Brief and Joint Appendix.

Respectfully submitted this 14th day of August 2014.

By: s/Hannah Rogers Metcalfe
Hannah Rogers Metcalfe
(Fed ID #9943)
Metcalfe & Atkinson, LLC
PO Box 1826
Greenville, SC 29602
Phone: (864) 214-2340
hmetcalfe@malawfirm.com
ATTORNEY FOR APPELLANT

Greenville, South Carolina
August 14, 2014

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing pleading was served on the following parties to this action to:

Andrew Burke Moorman
Assistant United States Attorney
For the District of South Carolina
55 Beattie Place, 7th Floor
Greenville, SC 29601

by electronically filing the foregoing with the Clerk of Court on August 14, 2014, using the CM/ECF system which will send notification of such filing in the above or by US Mail.

This 14th day of August 2014.

s/Hannah Rogers Metcalfe _____

Hannah Rogers Metcalfe

(Fed ID #9943)

Metcalfe & Atkinson, LLC

PO Box 1826

Greenville, SC 29602

Phone: (864) 214-2340

hmetcalfe@malawfirmssc.com

ATTORNEY FOR APPELLANT